

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SAVEITSAFE, LLC,

Plaintiff,

v.

ORACLE CORPORATION,

Defendant

Case No. 6:20-cv-00286-ADA

JURY TRIAL DEMANDED

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE RESPOND**

Defendant Oracle Corporation hereby moves the Court for an order extending the time for Defendant to answer, move, or otherwise respond to Plaintiff’s Complaint for Patent Infringement (Dkt. 1).

The deadline for Oracle Corporation to answer, move, or otherwise respond to Plaintiff’s Complaint is May 13, 2020. Defendant requests a 45-day extension of time to answer, move, or otherwise respond to Plaintiff’s Complaint to Monday, June 29, 2020. Plaintiff has agreed to Defendant’s request. This request for extension is the first request by Defendant for an extension of time to answer, move, or otherwise respond. The request is not sought for purposes of delay and will not affect any other case deadlines.

Therefore, Defendant respectfully requests that the Court extend the deadline for Defendant to answer, move, or otherwise respond to Plaintiff’s Complaint to Monday, June 29, 2020.

Dated: April 30, 2020

Respectfully submitted,

/s/ John M. Guaragna

John M. Guaragna
Texas Bar No 24043308
DLA PIPER LLP (US)
401 Congress Avenue, Suite 2500
Austin, TX 78701-3799
Tel: 512.457.7125
Fax: 512.457.7001
john.guaragna@dlapiper.com

ATTORNEY FOR DEFENDANT
ORACLE CORPORATION

CERTIFICATE OF CONFERENCE

I hereby certify that the undersigned counsel for Defendant, Oracle Corporation conferred with Plaintiff's counsel. Plaintiff has agreed to Defendant's request sought in this motion.

/s/ John M. Guaragna
John M. Guaragna

CERTIFICATE OF SERVICE

I hereby certify that on the 30th day of April 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing via electronic mail to all counsel of record. Any other counsel of record will be served by first class U.S. mail.

/s/ John M. Guaragna
John M. Guaragna